

**NEVADA DIVISION OF ENVIRONMENTAL PROTECTION
FACT SHEET**

(Pursuant to NAC 445A.236)

Permittee: Caesar's Palace Hotel and Casino
3750 Las Vegas Blvd South
Las Vegas NV 89109

Permit No.: NV0023191

Facility: Two dewatering treatment systems at Caesar's Palace Hotel & Casino
NW corner of Las Vegas Blvd and Flamingo Rd

General: Caesar's has submitted an application to modify existing NPDES permit NV0023191, which is for a sediment filter and carbon adsorption canisters installed to treat contaminated groundwater intercepted by dewatering wells serving the parking garage. Discharge is to a Clark County storm drain. The subject of the modification is a similar additional system for the adjacent Forum Shops. The Forum system was initially constructed and operated under temporary permits, first TNEV2003368, then TNEV2003459. The capacities of the garage and Forum systems are 200 gpm and 100 gpm, respectively. The contaminant that brought about the need for the treatment system is tetrachloroethylene (perchloroethylene, or PCE) at about 80 µg/l. A Focused Phase 1 site investigation is currently being conducted to determine the source of the PCE, pursuant to the Division's Bureau of Corrective Actions. Other contaminants occurring in the groundwater include nitrate at 6 mg/l and total dissolved solids (TDS) at 2800 mg/l. TDS and nitrate are not treated by carbon systems.

Receiving Water Characteristics: The storm drain system in this area reaches Las Vegas Wash via Flamingo Wash at Desert Rose Golf Course. The water quality standards for Upper Las Vegas Wash (NAC445A.199 and .200), below the city and county wastewater treatment plants, include 20 mg/l total inorganic nitrogen, and 1900 mg/l total dissolved solids. Data collected by the Las Vegas Stormwater Quality Management Committee (stormwater NPDES permit NV0021911) immediately below Desert Rose Golf Course and above the treatment plant discharges, gives average values of total nitrogen 5.5 mg/l, total phosphorus < 0.02 mg/l, and TDS 2700 mg/l.

Rationale for Permit Requirements: Flow limits have been set to accommodate the dewatering systems. Total dissolved solids concentrations are reported so that inputs to the Colorado River system can be tracked if needed. The total inorganic nitrogen limit has been set at the water quality standard for Upper Las Vegas Wash. Phosphorus isn't removed by carbon systems but is reported due to the total maximum daily load that has been established for Las Vegas Wash. The total petroleum hydrocarbon limit of 1 mg/l is easily achievable and is typically used in groundwater remediation permits as a precaution against unforeseen circumstances. The PCE limit is set at the drinking water standard, and the pH limit is set at the water quality standard. The annual volatile organics influent scan is based on the unknown extent of

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contamination in the area. Table I.A.1 from the permit, containing the above mentioned limits, is reprinted below. Note: Outfall 001 is the discharge point for the dewatering and treatment system serving the parking garage, and Outfall 002 is the discharge point for the dewatering and treatment system serving the Forum Shops.

Table I.A.1

Parameter	Discharge Limitations		Monitoring Requirements		
	30 Day Average	Daily Maximum	Sample Location ^{(1) (2)}	Measurement Frequency	Sample Type
Flow 001, MGD	0.288	-	001	continuous	flow meter
Flow 002, MGD	0.144	-	002	continuous	flow meter
TDS ⁽³⁾ , mg/l	-	m & r	001 & 002	monthly	discrete
TIN ⁽⁴⁾ , mg/l	-	20	001 & 002	monthly	discrete
Total Phosphorus, mg/l	-	m & r	001 & 002	monthly	discrete
TPH ⁽⁵⁾ , mg/l	-	1	001 & 002	monthly	discrete
PCE ⁽⁶⁾ , µg/l	-	5	001 & 002	monthly	discrete
Volatile Organics ⁽⁷⁾	-	m & r	influent ⁽⁸⁾	annual	discrete
pH, standard units	-	6.5 to 9.0	001 & 002	monthly	discrete

m & r = monitor and report

- (1) 001 = Outfall 001. Samples shall be collected from the existing sample port until the three month anniversary of the effective date of this permit, at which point they shall be collected from the new sample port to be installed between the primary and secondary carbon canisters. See Part I.A.17.c. Flow shall be measured following the secondary canister.
- (2) 002 = Outfall 002. Samples shall be collected from the intermediate sample port between the two parallel primary canisters and the single secondary canister. Flow shall be measured after the secondary canister.
- (3) Total Dissolved Solids
- (4) Total Inorganic Nitrogen
- (5) Total Petroleum Hydrocarbons by EPA Method 8260
- (6) PCE = perchloroethylene = tetrachloroethylene
- (7) EPA Method 8260, report all parameters. Report results in fourth quarter report.
- (8) Influent to each treatment system

Schedule of Compliance: An updated O & M manual is due on the two month anniversary of the effective date of the permit to accommodate a new sample port between the carbon canisters of the garage dewatering treatment system (Outfall 001).

Procedures for Public Comment: The Notice of the Division's intent to modify discharge permit NV0023191, authorizing a treated dewatering discharge to the Clark County storm drain system, and ultimately to Las Vegas Wash, subject to the conditions contained within the permit, is being sent to the **Las Vegas Review Journal** for publication. The notice is being mailed to interested persons on our mailing list. Anyone

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wishing to comment on the proposed permit can do so in writing for a period of thirty (30) days following the date of publication of the public notice in the newspaper. The comment period can be extended at the discretion of the Administrator. The deadline for receipt of all written comments is 5:00 PM Thursday April 22, 2004. Comments postmarked prior to that deadline will also be accepted.

A public hearing on the proposed determination can be requested by the applicant, any affected State or interstate agency, the Regional Administrator, or any interested agency, person, or group of persons. The request must be filed within the comment period and indicate the interest of the person filing the request and the reasons why a hearing is warranted.

Any public hearing the Administrator determines to hold must be conducted in the geographical area of the proposed discharge or any other area the Administrator determines to be appropriate. All public hearings must be conducted in accordance with NAC 445A.238.

The final determination of the Administrator may be appealed to the State Environmental Commission pursuant to NRS 445A.605.

Proposed Determination: The Division has made the tentative determination to renew the proposed discharge permit for a five year term.

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